

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

INEOS FLUOR AMERICAS LLC,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 06-189-SLR
)	
HONEYWELL INTERNATIONAL INC.,)	
)	
Defendant.)	

STIPULATION AND ORDER NO. 2 AMENDING SCHEDULING ORDER

WHEREAS, the parties believe that a two-week extension of certain imminent deadlines should allow them sufficient time to finalize a settlement and file a stipulation of dismissal;

NOW, THEREFORE, IT IS HEREBY STIPULATED BY THE PARTIES, subject to the approval of the Court, that:

1. Paragraph 2(g) of the Scheduling Order of July 6, 2006 (D.I. 21) is amended as follows:

Event	Original Date	Revised Date
Completion of depositions of experts on issues for which any party has the burden of proof	June 8, 2007	June 22, 2007
Rebuttal expert reports served	June 22, 2007	July 6, 2007
Completion of depositions of rebuttal experts	July 31, 2007	August 14, 2007
Completion of all expert discovery	July 31, 2007	August 14, 2007

2. The time to file and serve reply briefs on all pending motions to compel (D.I. 97, 100, and 104) is extended to and including June 22, 2007.

YOUNG CONAWAY STARGATT & TAYLOR, LLP
/s/ Karen L. Pascale

C. Barr Flinn (#4092)
Karen L. Pascale (#2903)
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801
(302) 571-6600

OF COUNSEL:

AXINN, VELTROP & HARKRIDER LLP
Richard S. Order
Mark D. Alexander
90 State House Square
Hartford, CT 06103
(860) 275-8100

*Attorneys for Plaintiff,
INEOS Fluor Americas LLC*

MORRIS, NICHOLS, ARSHT & TUNNELL LLP
/s/ Jason A. Cincilla

Martin P. Tully (#465)
Jason A. Cincilla (#4232)
1201 N. Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200

OF COUNSEL:

KIRKLAND & ELLIS LLP
Yosef J. Riemer
Andrew R. Dunlap
Michael D. Reisman
153 East 53rd Street
New York, NY 10022
(212) 446-4800
-and-
Mark L. Kovner
Michael S. Becker
655 Fifteenth Street, NW
Suite 1200
Washington, DC 20005-5793
(202) 879-5000

*Attorneys for Defendant,
Honeywell International Inc.*

June 1, 2007

SO ORDERED this _____ day of _____, 2007.

UNITED STATES DISTRICT JUDGE

846073.1

CERTIFICATE OF SERVICE

I, Jason A. Cincilla, Esquire, hereby certify that copies of **Stipulation and Order No. 2 Amending Scheduling Order** were served on June 1, 2007 as follows:

BY ELECTRONIC FILING:

C. Barr Flinn, Esq.
Karen L. Pascale, Esq.
Young Conaway Stargatt & Taylor, LLP
The Brandywine Building
1000 West Street, 17th Floor
P. O. Box 391
Wilmington, DE 19899-0391

BY ELECTRONIC MAIL:

Richard S. Order, Esq.
Axinn, Veltrop & Harkrider LLP
90 State House Square, 11th Floor
Hartford, Connecticut 06103
rso@avhlaw.com

/s/ Jason A. Cincilla

Jason A. Cincilla (#4232)